

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN

In Re:

CASE NO. 13-53846

CITY OF DETROIT, MICHIGAN,

CHAPTER 9

Debtor,  
\_\_\_\_\_ /

**NOTICE OF APPEARANCE AND REQUEST FOR DOCUMENTS, UNDER  
11 U.S.C. § 1109(b) AND FED. R. BANKR. P. 2002, 3017(a), 9007, 9010**

PLEASE TAKE NOTICE that the undersigned hereby files an appearance as counsel to National Industrial Maintenance – Michigan, Inc. AND, PURSUANT TO Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010 and 11 U.S.C. §1109(b), requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in this case, be transmitted to the following:

DEAN & FULKERSON  
Attn: Kevin N. Summers  
801 W. Big Beaver Road, Suite 500  
Troy, MI 48084  
Tel: (248) 362-1300  
Fax: (248) 362-1358  
Email: [Ksummers@dflaw.com](mailto:Ksummers@dflaw.com)

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit shall waive (1) the right of National Industrial to have final orders in non-core matters entered only after de novo review by the District Court; (2) the right of National Industrial to a trial by jury in any proceeding so triable in the above-captioned case or any case, controversy, or proceeding related to this case; (3) the right of National Industrial to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which

National Industrial is or may be entitled under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly preserved.

Respectfully submitted,

DEAN & FULKERSON

Dated: July 23, 2013

/s/ Kevin N. Summers

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